

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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BRIAN DIXON

CASE NO.

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES,  
LLC, EXPERIAN INFORMATION  
SOLUTIONS, INC., and TRANS UNION, LLC,

**TRANS UNION, LLC’S NOTICE  
OF REMOVAL**

Defendants.

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Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“TransUnion”) hereby removes the subject action from the Supreme Court of the State of New York, County of Suffolk to the United States District Court for the Eastern District of New York on the following grounds:

1. Plaintiff Brian Dixon (“Dixon”) is a natural person who resides in New York.
2. Defendant TransUnion is a Delaware corporation with its principal place of business in Illinois.

**NATURE OF CASE**

3. On January 2, 2025, Dixon commenced this action in the Supreme Court of the State of New York, County of Suffolk, entitled *Brian Dixon v. Equifax Information Services, LLC, et al.*, Index Number 600110/2025 via a Summons with Notice. A true and correct copy of the Summons with Notice is attached hereto as **Exhibit A**.

4. On January 6, 2025, Dixon served TransUnion with a Summons with Notice filed in Supreme Court of the State of New York, County of Suffolk, Index Number 600110/2025. *See* Ex. A. No other process, pleadings, or orders have been served on TransUnion.

5. Laufer makes claims under and alleges that TransUnion violated the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”) and General Business Law, 15 U.S.C. § 380-j(e) et seq. (the “GBL”). *See* Ex. A.

6. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

7. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Supreme Court of the State of New York, County of Suffolk, to the United States District Court for the Eastern District of New York.

8. Removal is timely under 28 U.S.C. § 1446 because this Notice of Removal is filed within 30 days after TransUnion’s receipt of a copy of the Summons with Notice, filed in the Supreme Court of the State of New York, County of Suffolk.

9. Attached hereto as **Exhibit B** is a copy of TransUnion’s Notice of Filing Notice of Removal to be filed in the Supreme Court of the State of New York, County of Suffolk, Number 600110/2025.

10. Counsel for Equifax Information Services, LLC and Experian Information Solutions, Inc. have consented to removal. Attached hereto as **Exhibit C** is a copy of the consent forms.

11. Notice of this Removal will promptly be filed with the Supreme Court of the State of New York, County of Suffolk and served upon all parties.

**WHEREFORE**, Defendant TransUnion, by counsel, removes the subject action from the Supreme Court of the State of New York, County of Suffolk to this United States District Court, Eastern District of New York.

Date: January 31, 2025

**BUCHANAN INGERSOLL & ROONEY PC**

/s/ Andrew G. Hope

Andrew G. Hope (NY Bar ID No. 4913547)

Makenzie P. Leh, Esq. (*Pro Hac* Admission  
Forthcoming)

640 5th Avenue, 9th Floor

New York, New York 10019-6102

215 665 5322 (o)

Andrew.hope@bipc.com

*Counsel for Trans Union, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 31<sup>st</sup> day of January 2025, I caused a copy of the foregoing Notice of Removal to be electronically filed with the Clerk via CM/ECF. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing systems and via United States First Class Mail. Parties may access the filing through the Court's CM/ECF System.

Dated: January 31, 2025

/s/ Andrew G. Hope  
Andrew G. Hope

# EXHIBIT A

**FILED: SUFFOLK COUNTY CLERK 01/02/2025 02:54 PM**

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 01/02/2025

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF SUFFOLK**

BRIAN DIXON,

*Plaintiff,*

-against-

EQUIFAX INFORMATION SERVICES, LLC,  
EXPERIAN INFORMATION SOLUTIONS,  
INC., and TRANS UNION, LLC,*Defendants.***SUMMONS WITH NOTICE**

To the Entities Named as Defendants Above:

**PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED** to appear in this action by serving notice of appearance on the Plaintiff at the address of Plaintiff's counsel, via the NYSCEF system, within 20 days after the service of this Summons (not counting the day of service itself), or within 30 days after service is complete if the summons is not delivered personally to you within the State of New York.

**YOU ARE HEREBY NOTIFIED THAT** should you fail to answer or appear, a judgment will be entered against you by default for the relief demanded below.

Dated: January 2, 2025  
New York, NY

/s/ Adam G. Singer

Adam G. Singer

**LAW OFFICE OF ADAM G. SINGER, PLLC**

One Grand Central Place

60 E. 42nd Street, Suite 4600

New York, NY 10165

212.842.2428

asinger@adamsingerlaw.com

*Counsel for Plaintiff Brian Dixon***Defendants' Addresses:**

Equifax Information Services, LLC, 1550 Peachtree Street, N.W., Atlanta, Georgia 30309

Experian Information Solutions, Inc., 475 Anton Boulevard, Costa Mesa, CA 92626

Trans Union, LLC, 555 W. Adams St., Chicago, IL 60661

**FILED: SUFFOLK COUNTY CLERK 01/02/2025 02:54 PM**

INDEX NO. 600110/2025

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 01/02/2025

**Notice: The nature of this action is:**

Defendants Experian Information Solutions, Inc., Equifax Information Services, LLC, and Trans Union LLC, (together, the "CRA Defendants") violated the law including the following provisions:

- 15 U.S.C. § 1681e (b)
- 15 U.S.C. § 1681i
- General Business Law § 380-f
- General Business Law § 380-j

Those violations include the following conduct by one or more of the CRA Defendants:

- maintaining in and reporting from the credit file they maintained about Plaintiff information they had reason to know was inaccurate;
- failing to maintain reasonable procedures to assure the maximum possible accuracy of information they reported about Plaintiff;
- failing to conduct reasonable investigations after Plaintiff disputed certain information in credit reports they published about him; and
- failing to promptly delete disputed information from credit files they maintained about Plaintiff despite the fact that, had they conducted reasonable investigations of Plaintiff's disputes, they could not have affirmatively verified that the disputed information was accurate.

As a consequence of the CRA Defendants' violations, Plaintiff has suffered pecuniary and non-pecuniary harm.

**The relief sought is:**

- Actual damages for both economic and emotional harm in an amount exceeding \$25,000 and to be determined by the trier of fact,
- \$1,000 in statutory damages per violation,
- punitive damages in an amount to be determined by the trier of fact,
- injunctive relief against reporting or continuing to report the inaccurate information,
- litigation costs and expenses, and
- reasonable attorney's fees.

Should the CRA Defendants fail to appear herein, judgment will be entered by default for the sum of \$3,000,000.00, with interest to run from January 2, 2025.

**Jury Trial:** Plaintiff demands a jury trial on all issues so triable.

**Venue:** Plaintiff designates Suffolk County as the place of trial. The basis of this designation is that Plaintiff resides in Suffolk County at 10 Jefferson Landing Circle, Port Jefferson, NY 11777-1963.

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF SUFFOLK**

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BRIAN DIXON,

*Plaintiff,*

-against-

EQUIFAX INFORMATION SERVICES, LLC,  
EXPERIAN INFORMATION SOLUTIONS,  
INC., and TRANS UNION, LLC,

Index No. 600110/2025

*Defendant.*

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**NOTICE OF ELECTRONIC FILING  
(Mandatory Case)  
(Uniform Rule § 202.5-bb)**

**You have received this Notice because:**

1) The Plaintiff/Petitioner, whose name is listed above, has filed this case using the New York State Courts E-filing system ("NYSCEF"), and

2) You are a Defendant/Respondent (a party) in this case.

● **If you are represented by an attorney:**

Give this Notice to your attorney. (Attorneys: see "Information for Attorneys" pg. 2).

● **If you are not represented by an attorney:**

**You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.**

**If you choose to participate in e-filing, you must have access to a computer and a scanner or other device to convert documents into electronic format, a connection to the internet, and an e-mail address to receive service of documents.**

The **benefits of participating in e-filing** include:

- serving and filing your documents electronically
- free access to view and print your e-filed documents
- limiting your number of trips to the courthouse
- paying any court fees on-line (credit card needed)

**To register for e-filing or for more information about how e-filing works:**

- visit: [www.nycourts.gov/efile-unrepresented](http://www.nycourts.gov/efile-unrepresented) or
- contact the Clerk's Office or Help Center at the court where the case was filed. Court contact information can be found at [www.nycourts.gov](http://www.nycourts.gov)



To find legal information to help you represent yourself visit [www.nycourthelp.gov](http://www.nycourthelp.gov)

**Information for Attorneys  
(E-filing is Mandatory for Attorneys)**

An attorney representing a party who is served with this notice must either:

- 1) immediately record his or her representation within the e-filed matter on the NYSCEF site [www.nycourts.gov/efile](http://www.nycourts.gov/efile) ; or
- 2) file the Notice of Opt-Out form with the clerk of the court where this action is pending and serve on all parties. Exemptions from mandatory e-filing are limited to attorneys who certify in good faith that they lack the computer hardware and/or scanner and/or internet connection or that they lack (along with all employees subject to their direction) the knowledge to operate such equipment. [Section 202.5-bb(e)]

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at [www.nycourts.gov/efile](http://www.nycourts.gov/efile) or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: [nyscef@nycourts.gov](mailto:nyscef@nycourts.gov)).

Dated: January 2, 2025

Name  
Adam G. Singer

Firm Name  
Law Office of Adam G. Singer, PLLC

Address  
One Grand Central Place  
60 E. 42nd Street, Suite 4600  
New York, NY 10165

Phone  
212.842.2428

E-Mail  
[documents@adamsingerlaw.com](mailto:documents@adamsingerlaw.com)

To: Trans Union, LLC,  
555 W. Adams Street  
Chicago, IL 60661

# EXHIBIT B

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF SUFFOLK

|  |                       |
|--|-----------------------|
| BRIAN DIXON<br><br>Plaintiff,<br><br>vs.<br><br>EQUIFAX INFORMATION SERVICES,<br>LLC, EXPERIAN INFORMATION<br>SOLUTIONS, INC., and TRANS UNION,<br>LLC,<br><br>Defendants. | Index No. 600110/2025 |
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**NOTICE OF FILING NOTICE OF REMOVAL  
WITH THE UNITED STATES DISTRICT COURT**

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Please take notice that Defendant Trans Union, LLC has filed the attached Notice of Removal with the Clerk of the United States District Court for the Eastern District of New York on January 31, 2025. A true and correct copy of the Notice of Removal filed with the United States District Court Eastern District of New York is attached hereto as **Exhibit A**.

Date: January 31, 2025

**BUCHANAN INGERSOLL & ROONEY PC**

/s/ Andrew G. Hope  
Andrew G. Hope (NY Bar ID No. 4913547)  
640 5th Avenue, 9th Floor  
New York, New York 10019-6102  
215 665 5322 (o)  
Andrew.hope@bipc.com

*Counsel for Trans Union, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 31<sup>st</sup> day of January 2025, I caused a copy of the foregoing Notice of Filing Notice of Removal to be electronically filed with the Clerk via CM/ECF. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing systems and via United States First Class Mail. Parties may access the filing through the Court's CM/ECF System.

Dated: January 31, 2025

/s/ Andrew G. Hope  
Andrew G. Hope

# EXHIBIT C

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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BRIAN DIXON

CASE NO.

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES,  
LLC, EXPERIAN INFORMATION  
SOLUTIONS, INC. and TRANS UNION,  
LLC,

Defendants.

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**DEFENDANT EQUIFAX'S CONSENT TO REMOVAL**

Without waiving any of its defenses or other rights, Defendant Equifax Information Services, LLC, hereby acknowledges its consent to the removal of this action from the Supreme Court of the State of New York, County of Suffolk to the Eastern District of New York.

Date:

Respectfully submitted,



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Adam Hill, Esquire  
Seyfarth Shaw LLP  
233 S. Wacker Drive, Suite 8000  
Chicago, Illinois 60606-6448  
ahill@seyfarth.com

*Counsel for Defendant, Equifax Information  
Services, LLC.*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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BRIAN DIXON

CASE NO.

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES,  
LLC, EXPERIAN INFORMATION  
SOLUTIONS, INC. and TRANS UNION,  
LLC,

Defendants.

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**DEFENDANT EXPERIAN'S CONSENT TO REMOVAL**

Without waiving any of its defenses or other rights, Defendant Experian Information Solutions, Inc., hereby acknowledges its consent to the removal of this action from the Supreme Court of the State of New York, County of Suffolk to the Eastern District of New York.

Date: 01/24/2025

Respectfully submitted,

*Kim Purcell*

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Kim A. Purcell, Esquire  
Kim.purcell@experian.com

*Representative for Defendant, Experian  
Information Solutions, Inc.*